

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

VOLKSWAGEN GROUP OF AMERICA, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-01574-AJT-MSN

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff Volkswagen Group of America, Inc., by counsel, and pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65, by counsel, hereby moves for entry of a preliminary injunction.

For the reasons set forth in Plaintiff's accompanying memorandum, Plaintiff respectfully requests that this Court issue a preliminary injunction freezing the respective PayPal accounts of the Defendants identified in Schedule A to the Complaint.

Date: January 14, 2020

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)

Daniel E. Yonan (VSB No. 46019)

Nicholas J. Nowak (*pro hac vice*)

Daniel S. Block (*pro hac vice*)

STERNE KESSLER GOLDSTEIN & FOX, PLLC

1100 New York Ave., N.W., Suite 600

Washington, DC 20005-3934

Telephone No.: (202) 371-2600

Facsimile No.: (202) 371-2540

mtalley@sternekessler.com

dyonan@sternekessler.com

nnowak@sternekessler.com

dblock@sternekessler.com

Attorneys for Plaintiff